

Anthony Paronich <anthony@paronichlaw.com>

Thu, Jun 12, 2025 at 6:12 PM

RE: SML-8391 Subpoena - Wilson v. Texona Marketing 24-4003

1 message

Anthony Paronich <anthony@paronichlaw.com>

To: legal@dialpad.com

Cc: Andrew Perrong <a@perronglaw.com>

Bcc: Anthony Paronich <anthony@paronichlaw.com>

Hello:

This is our final attempt to confer.

Anthony Paronich Paronich Law, P.C. 350 Lincoln Street, Suite 2400

Hingham, MA 02043 [o] (617) 485-0018

[c] (508) 221-1510 [f] (508) 318-8100

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From: Anthony Paronich <anthony@paronichlaw.com>

Sent: Tuesday, June 10, 2025 11:20 AM

To: legal@dialpad.com

Cc: Andrew Perrong <a@perronglaw.com>

Subject: Re: SML-8391 Subpoena - Wilson v. Texona Marketing 24-4003

Hello, please advise when we will get these documents or provide a time this week to meet and confer for our anticipated motion.

6/15/25, 3:16 P	M
Regards	,

Anthony Paronich

Paronich Law, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

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On Thu, Jun 5, 2025 at 8:19 AM Anthony Paronich <anthony@paronichlaw.com> wrote:

Hello, Alexandra. What if we started with the calling records for just the Caller ID(s) that contacted the Plaintiff via text. They are: (469) 382-2921, 323-925-3759, 469-296-9590

However, we can't change the temporal scope. That's within the class period we're pursuing.

Regards,

Anthony Paronich

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On Wed, May 21, 2025 at 6:28 PM Alexandra Walker <jira@dialpad.atlassian.net> wrote:

Reply above this line.

Alexandra Walker commented:

Hi Anthony,

Request No. 1 of the subpoena, as currently drafted, is overbroad and imposes an undue burden. Producing the call detail records for every phone number associated with the customer's account since 2023 (nearly 500 numbers total) would require an extensive effort, taking several weeks that our Legal team does not have the bandwidth for. We're happy to work with your team to achieve the relevant information needed, but to do so would require a significant limitation of the scope of Request No. 1. I'm happy to hop on a call to discuss an adequate solution at your convenience, let me know your thoughts.

Thanks,

Alexandra Walker

Corporate Paralegal O: 415.805.2076

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This is shared with a@perronglaw.com and anthony@paronichlaw.com.

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